

VIA RESS

May 14, 2026

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4

Dear Mr. Murray,

**RE: EB-2019-0207 – Notice of Proposal to Amend the Distribution System Code –
Distributed Energy Resources Connections Review**

Alectra Utilities Corporation (“Alectra”) appreciates the opportunity to comment on the Ontario Energy Board’s (“OEB”) proposed amendments to the Distribution System Code (“DSC”) related to Distributed Energy Resource (“DER”) information sharing between distributors and the Independent Electricity System Operator (“IESO”). Alectra recognizes the importance of improving the visibility of DERs across the electricity system to support prudent planning, forecasting, and system integration activities. Alectra also understands the broader policy direction underlying the proposal and the increasing importance of information sharing as DER adoption continues to grow in Ontario.

As an electricity distributor with a significant amount of DERs connected to its system, Alectra is a key partner in this work and brings a unique distribution system operational perspective. Alectra is supportive of the collaborative efforts between the OEB, IESO, and other partners that seek to improve the shared objective of maintaining a reliable and efficient electricity system for Ontario electricity consumers. Alectra provides its feedback on the Notice of Proposal in this spirit.

Constructive Feedback

While Alectra understands that the proposed amendments are intended to support the broader objective of optimizing DER integration across Ontario, additional clarity on the intended purpose and use of the information would be helpful. For example, before distributors are expected to review applicable records and compile the requested information, it would be beneficial to understand how each data stream is intended to support the IESO’s activities. This could include whether the information is intended for planning purposes, forecasting, reliability, DER integration, market administration, operational coordination, or other uses. A better understanding of the use cases would assist distributors in understanding the scope of the request.

Alectra also notes that there are a number of existing information sources available to the IESO, including registration records, metering records, settlement systems, procurement records, monitoring systems, connection assessments and regional planning data. As a result, the IESO may already possess a significant amount of the information contemplated by the proposal through existing processes associated with FIT, microFIT, net metering, procurements and other similar programs. There may also be some overlap with existing reporting obligations, including the OEB's Reporting and Record-Keeping Requirements ("RRR"). Additional details on how the proposed new data sharing are intended to align with or complement existing reporting frameworks would be beneficial to minimize duplication.

In Alectra's view, it may be helpful for the IESO to first identify what information gaps there are, and whether the identified gaps can be addressed through existing information sources prior to requesting additional data from distributors. A field-by-field data source and gap analysis could help ensure that any new reporting obligations are appropriately targeted, avoid duplication to the extent possible, and remain proportionate to the need.

Alectra notes the inclusion of language permitting requests for "any other static information as may be reasonably requested by the IESO." While Alectra understands the intent of allowing flexibility as needs evolve, additional clarity regarding what constitutes "reasonable" would help reduce uncertainty for distributors. It may be appropriate to further narrow or clarify this language so that requests remain tied to clearly defined DER asset information that is necessary for the stated purpose and already maintained by distributors in the normal course of business. Similarly, clarification would also be helpful regarding the treatment of "future connections". It is unclear at what stage of project development a DER connection would become reportable. For example, it is unclear whether this would apply to early-stage inquiries and consultations, CIA applications, offers to connect, executed connection agreements, construction stages, energization, or only projects that proceed to finalization and operationalization.

From an implementation perspective, while the general data exists within distributor systems, compiling it and formatting it in the form contemplated by the proposal may require a significant effort. The information resides across multiple systems, including customer information systems, connection records, GIS platforms, and engineering assessments or studies. Responding to requests will most likely require distributors to pull information together from multiple sources, conduct data validation and quality checks, and provide it in the required format. Depending on the cadence and level of detail required, this may involve more than an incremental level of effort. The proposed amendments do not specify the expected frequency of reporting requests. Whether requests occur monthly, quarterly, annually or on an ad hoc basis could have an impact on resourcing for distributors. Similarly, additional details regarding submission formats, correction processes, and other expectations would assist distributors in assessing implementation requirements. Alectra also suggests that any reporting cadence should remain proportionate to the demonstrated use case for the information. For example, if the information is primarily

intended for long-term planning, more frequent reporting intervals (i.e. monthly) may not be necessary.

Alectra believes that there is value in developing data sharing frameworks that are mutually beneficial and that information sharing between distributors and the IESO should continue to evolve alongside DER integration initiatives and future Distribution System Operator (“DSO”)-related work. Where distributors are expected to provide increasingly granular DER information, there may also be a benefit to distributors receiving access to useful system-level information and insights related to DER activity occurring within their service territories, including information associated with IESO-administered programs, procurements, aggregations, pilot programs, and market participating DERs.

Alectra views this as an opportunity to continue building a collaborative framework that supports improved coordination and planning across the electricity sector. Alectra appreciates the opportunity to provide comments on these proposed DSC amendments.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lister".

Michael Lister
Director, Regulatory Affairs, Policy & Strategy
Alectra Utilities Corporation